

**Main Office**

10060 Goethe Road  
Sacramento, CA 95827-3553  
Tel: 916.876.6000  
Fax: 916.876.6160

**Treatment Plant**

8521 Laguna Station Road  
Elk Grove, CA 95758-9550  
Tel: 916.875.9000  
Fax: 916.875.9068

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September 16, 2013

Dr. Peter Goodwin  
Delta Science Program  
980 K Street  
Sacramento, CA 95814

Sent via e-mail to [science@deltacouncil.ca.gov](mailto:science@deltacouncil.ca.gov)

**Subject: Sacramento Regional County Sanitation District Comments on the  
Second Draft Delta Science Plan, August 22, 2013**

Dear Dr. Goodwin:

The Sacramento Regional County Sanitation District (SRCSd) appreciates the opportunity to comment on the Second Draft Delta Science Plan (Science Plan). SRCSd provides wastewater collection and treatment services to 1.4 million residents of the greater Sacramento area. SRCSd operates its treatment system in compliance with its National Pollutant Discharge Elimination System (NPDES) permit, providing protection of beneficial uses in the Sacramento River and Sacramento-San Joaquin Delta.

SRCSd's NPDES permit is regularly updated and the renewal process relies heavily on the best available science. Therefore it is imperative that the Science Plan establish a well defined process that fosters a collaborative culture among a variety of different interests to avoid the "combat" science that has often taken place in the debate over Delta issues. SRCSd believes that the Science Plan must include a structure that provides a robust and transparent stakeholder process, as well as independent scientific review so that credible scientific knowledge can be provided to help inform management and policy decisions that will result in measureable and cost-effective water quality benefits.

This draft of the Science Plan clearly embraces the paradigm shift to create a new way of conducting Delta science to better inform policy and management decisions that will help achieve the co-equal goals. SRCSd is very supportive of this shift. We appreciate the changes that have been made to the plan to provide greater clarity on the various forums, committees, and teams, as well as the attempt to make a stronger connection between science-policy-management experts and interests. However, we would still encourage more details regarding the composition and functioning of these groups and how various affected stakeholders can engage. Some of our recommendations regarding stakeholder involvement and timing are highlighted below, with more specific comments attached.

- SRCSd recommends adding a process for more public input, by allowing agencies not represented by the Science Policy Forum to submit in writing their perspectives about "grand challenges".

- Although the Science Action Agenda appears to make a bottom up connection, it still lacks a connection to management actions. Since it is also the only area that clearly includes representation from local agencies and the regulated community, it is critical that these agencies be involved at multiple stages and levels of this new process, to build trust among the scientific, policy, and management communities.
- It is clear from the current structure that the Delta Science Program will need additional staffing and flexibility to carry out its vision and mission. SRCSD recognizes the need for the Delta Science Plan to get initiated sooner, rather than later, to help develop the information necessary to make sound public policy decisions. We support an early implementation schedule, provided that there is a built-in review process that occurs within a year of implementation. This review process should include feedback from both participating entities and affected stakeholders so that the Plan can be adaptively managed and processes evaluated and modified as necessary.
- In order for the Science Plan to be successful, it must promote coordination and stakeholder involvement, and must avoid top-down decision-making and lack of transparency. Proactive linkages between policy, management, and science representatives will be an essential step in resolving some of those problems. We strongly recommend adding management representatives to the Policy-Science Team to provide the proper structure to enable these linkages and to encourage more coordination and collaboration.

SRCSD has been a strong supporter of working with other stakeholders to use sound, objective science to inform policy and management decisions that will result in measureable water quality benefits. In addition to our specific comments that are attached, we have also included a fact sheet on our most recent collaborative endeavor with the Delta Regional Monitoring Program (RMP). The Delta RMP is another example of successful Delta science, policy, management integration. We look forward to continuing to work collaboratively and being a key participant in the Delta science arena. Should you have any questions please contact me at 916-876-6092 or email to [mitchellt@sacsewer.com](mailto:mitchellt@sacsewer.com).

Sincerely,



Terrie Mitchell  
Manager of Legislative and Regulatory Affairs  
Sacramento Regional County Sanitation District

cc: Prabhakar Somavarapu  
Christoph Dobson  
Linda Dorn  
Kurt Ohlinger

Attachments: 1. SRCSD Specific Comments on the Second Draft Delta Science Plan  
2. Information Sheet on Successful Programs with Diverse Stakeholder Participation:  
The Delta Regional Monitoring Program

Page 1, Line 23. The scientific synthesis activities envisioned by the Delta Science Plan are urgently needed, but the most effective process to create scientific synthesis remains uncertain. We recommend that the Delta Science Plan be implemented quickly to start providing benefits to the Delta community, but retain enough flexibility within the Plan's structure and procedures to learn from initial activities and refine (adapt) their synthesis and community building methods to maximize future benefits and achieve One Delta, One Science.

Page 5, Line 27. Waiting 4-years to update the Science Action Agenda and State of Bay-Delta Science seems too long for these important synthesis activities. It would be beneficial to attempt a 2-year cycle for these activities, so they incorporate continuous scientific advancement and changing research needs. A 2-year cycle would also match the rotation rate of the Delta Science Program's Lead Scientist and the Bay-Delta Science Conference.

Page 7, Line 18. The Science Steering Committee should provide important guidance and valuable insight in many subject areas for the Delta Science Program, but it is important that Delta Science Program staff, and not members of the Science Steering Committee, produce requests for proposals for scientific synthesis and lead Delta Science Plan synthesis activities. Steering committee members will be selected from multiple interest groups and may not have the same level of independence during scientific synthesis activities as compared to Delta Science Program scientists.

Page 11, Line 5. Policy-Science Forums should be public meetings, where the "grand challenges" presented by different agencies and discussions can be viewed. It would be highly beneficial to allow organizations not sitting in the Policy-Science Forum to submit letters to Delta Science Program in advance of the meeting, describing the "grand challenges" identified by their organizations. Organizations participating in the Policy-Science Forum should also submit "grand challenge" identification letters to the Delta Science Program in advance, so an outline for the forum discussion can be created. This additional structure would help focus the Policy-Science Forum and insure that "grand challenges" identified by the entire scientific community are considered for discussion. Forum participants can also identify additional "grand challenges" during the meeting. It would be beneficial to allow the public an opportunity to comment before the meeting's conclusion.

Page 11, Line 14. Lead/Chief Scientists with responsibilities in the Delta would include agencies such as SRCS D or the State and Federal Water Contractors, and should be included in Appendix B.

Page 12, Line 13. A website tracking ongoing scientific research, modeling, monitoring, publications, reports, peer reviews, and other relevant Delta activities would be extremely beneficial. The website should provide short summaries of current Delta science research and activities, with links to released reports, similar to an expanded version of Science News. Also the SWRCB should be included in "Action Participants".

Page 13, Line 18. The Delta Science Program should provide public notice when workshops or other scientific synthesis activities are planned, so interested organizations can request participation. Additional invitations can also be sent from the Delta Science Program to particular organizations to help form diversified and experienced work teams. Detail to what "self forming" means and how it would be accomplished would be helpful.

Page 13, Line 30. The Annual State-of-Delta Address and independent Delta Science Plan performance measures are beneficial additions to the Plan.

Page 15, Figure 2-1. The figure indicates that “The State of Bay-Delta Science” would be a filter to the Policy-Science Forum from the Science Action Agenda, and the science action agenda is the only clear area with local agency representation. We request that other, more effective lines of communication to local agencies be developed.

Page 22, Line 21. Figure 4-1 should have arrows indicating that the [science knowledge base] will be used to inform [research projects], [monitoring programs], and [modeling].

Page 24, Line 2. It is unclear how other funding agencies will participate during the selection of research projects. More funding agencies may participate in the collaborative funding process if they can select projects for funding from the approved list after the solicitation process, and determine their available funding for particular projects. Funding agencies may wish to modify some aspect of solicited research designs to address their agencies specific needs. Agencies should have the opportunity to review and comment on reports from funded projects.

Page 25, Line 17. Describe how the Unified Delta Monitoring Program is expected to integrate with existing monitoring programs, such as the developing Delta Regional Monitoring Program. The Delta Science Plan needs to specify the expected operations and output of the Unified Delta Monitoring Program, and describe how the Program will be formed, how monitoring priorities will be selected, who will fund and conduct the additional monitoring efforts and how the Program’s findings will be synthesized and presented.

Page 26, Line 10. In addition to funding and coordinating monitoring efforts to address key knowledge gaps, the Delta Science Program should produce Unified Delta Monitoring Program Reports at least once every other year (perhaps within the State of Bay-Delta Science or the Pulse of the Delta), which identify trends in environmental, ecological, and anthropogenic conditions within the Delta, and comment on their potential significance and interconnectivity.

Page 31, Line 1. Members of the Delta science program should guide synthesis activities and recommend the structure of resultant synthesis products by mediating discussions within the Focused Science Synthesis teams, Delta Collaborative Analysis and Synthesis teams, and expert workshop planning teams. Delta Science Program staff should provide an independent point of contact to diffuse potential conflicts that arise during these meetings.

Page 31, Line 25. Many methods for future scientific synthesis procedures are presented in the Delta Science Plan. To receive full support from the Delta science community in accepting the resulting synthesis products, there should be an opportunity for organizations that did not participate in the process to review draft documents and provide written comments. The final product will be determined by the authors, but should acknowledge submitted comments.

Page 33, Line 10. In Figure 4.6-1, please exchange [UC Davis] with [California Universities], to include the large number of local universities that may conduct future peer-reviews of Delta science.

Page 37, Line 1. Many agencies conducting Delta research are in need of increased statistical and modeling guidance, which could be provided by Delta Science Program staff. Statistical consultants from the Delta Science Program could be requested by organizations to comment on the statistical strength of Delta-focused experimental, monitoring, or modeling projects (similar to requests for peer-review from the DSP) and could serve on the Delta Science Program peer review panels to comment on projects’ quantitative assessments. By providing this resource, the Delta Science

**Attachment 1**

**SRCSD Specific Comments on the Second Draft Delta Science Plan**

Program could directly increase the strength and quality of scientific research in the Delta community. An example of a possible resource is the statistical laboratory at UC Davis, which offers free statistical advice to graduate students and provides paid consultation, analysis and computation services to the University and external community.

Page 38, Line 6. The use of 'rotators' seems appropriate in the Delta Science Program, as they should build connections and trust in the Program and provide a method to temporarily increase staff for particular projects. We recommend that some part-time rotator positions be offered, so a greater representation of the scientific community can participate in the process.

Page 38, Line 37. The ability to use models to show different futures based on management decisions is essential to making the right management decisions in the Delta.

Appendix B, Line 10. The Delta Plan Interagency Committee is to be comprised of state and federal agency directors - how is the composition of the Interagency Committee different than the directors of state and federal institutions for the Science Policy Forum?

Information Sheet  
 Successful Programs with Diverse Stakeholder Participation

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**Program Name:** **Delta Regional Monitoring Program (RMP)**

**Program Objectives:** To initiate and implement a comprehensive, stakeholder-driven regional water quality monitoring program for the Delta that integrates and coordinates with ongoing monitoring efforts to better address Delta water quality issues.

**Program Leadership:** The Delta RMP is led by stakeholder representatives from regulatory, regulated, and coordinated monitoring groups. The program was initiated through the efforts of the Central Valley Regional Water Board with encouragement by the State Water Board and Delta Stewardship Council.

**Program Structure:** The program structure consists of a Steering Committee and Technical Advisory Committee. Funding for technical support by the Aquatic Science Center and Central Valley Regional Water Board staff is currently provided through the State Water Board and SWAMP.

**Program Area:** The Sacramento-San Joaquin Delta

**Time Period:** Work on the Delta RMP started in 2008. The program is being developed in phases to be a long term, self sustaining program that will function into the future.

**Stakeholders Represented:** Multiple stakeholder interests are represented on the Steering Committee, including:  
 Regulatory agencies – Central Valley Regional Water Board, USEPA, California Fish and Wildlife Service  
 Regulated community – Wastewater and storm water agencies, irrigated agriculture, State and Federal Water Contractors  
 Coordinated monitoring programs – Interagency Ecological Program  
 Others: USGS, Delta Science Program, Environmental Consultants, Industry Associations

Information Sheet  
Successful Programs with Diverse Stakeholder Participation

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Outcomes:	Steering Committee has adopted its vision, mission, goals and objectives and guiding principles. Fact Sheets which address science/policy/management questions are being developed as a foundational step in the development of the initial monitoring program.
Current Status:	Steering Committee is formed, meeting monthly. TAC Committee chairs have been selected, TAC Committee formation is ongoing. Work is progressing on the prioritization of parameters to be monitored. Work is ongoing to secure funding for the program.
Link:	<a href="http://www.waterboards.ca.gov/rwqcb5/water_issues/delta_water_quality/comprehensive_monitoring_program/index.shtml">http://www.waterboards.ca.gov/rwqcb5/water_issues/delta_water_quality/comprehensive_monitoring_program/index.shtml</a>